

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow, :
Plaintiff, :
v. : Civil Action No: 3:11-cv-00020-MHL
Friedman & MacFadyen, P.A. and : (Consolidated)
Johnie R. Muncy, :
Defendants.

**DEFENDANTS' CONSENT MOTION FOR
ENLARGEMENT OF TIME TO COMPLY WITH THIS
COURT'S SEPTEMBER 10, 2012 ORDER**

COME NOW the Defendants, with the consent of the Plaintiff, pursuant to Fed. R. Civ. P. 6(b), and move the Court for an Enlargement of Time until October 12, 2012 within which to file the responses referenced in Paragraph 4 of this Court's Order (Docket No. 50) dated September 10, 2012, and to file responses to the Amended Complaints, Motions to Amend, and Motion to Consolidate filed by Plaintiffs.

No party will be prejudiced as a result of an extension and justice will be served by granting this motion. The Plaintiffs have consented. For these reasons, the Defendants respectfully request an enlargement of time until October 12, 2012.

DATED: October 8, 2012

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.
JOHNIE MUNCY**

By Counsel

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB #35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)
Email: drucker@sandsanderson.com
Email: abiondi@sandsanderson.com
Email: cseltzer@sandsanderson.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of October, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Dale W. Pittman, Esq.
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb Street
Petersburg, Virginia 23803
Telephone: 804-861-6000
Facsimile: 804-861-3368
dale@pittmanlawoffice.com
Counsel for Plaintiff

John C. Petersen, Esq.
Surovell Isaacs Petersen & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-251-5400
Facsimile: 703-591-9285
jpetersen@smillaw.com
Counsel for Plaintiff

Kristi Cahoon Kelly, Esq.
Surovell Isaacs Peterson & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-277-9774
Facsimile: 703-591-2149
kkelly@smillaw.com
Counsel for Plaintiff

Leonard Anthony Bennett, Esq.
Consumer Litigation Associates, P.C.
12515 Warwick Boulevard
Suite 100
Newport News, Virginia 23606
Telephone: 757-930-3660
Facsimile: 757-930-3662
lenbennett@cox.net
Counsel for Plaintiff

Matthew J. Erausquin, Esq.
Consumer Litigation Associates, P.C.
1800 Diagonal Road
Suite 600
Alexandria, Virginia 22314
Telephone: 703-273-6080
Facsimile: 888-892-3512
matt@clalegal.com
Counsel for Plaintiff

Richard J. Rubin, Esq.
1300 Canyon Road
Santa Fe, New Mexico 87501
Telephone: 505-983-4418
Facsimile: 505-983-2050
dickrubin@cs.com
Counsel for Plaintiff

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB # 35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)
Email: drucker@sandsanderson.com
Email: abiondi@sandsanderson.com
Email: cseltzer@sandsanderson.com
Counsel for Defendants